

Bryan C. Assink
Texas State Bar No. 24089009
BONDS ELLIS EPPICH SCHAFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
(817) 405-6900 telephone
(817) 405-6902 facsimile
Email: bryan.assink@bondsellis.com

**COUNSEL FOR DEBTOR
AND DEBTOR-IN-POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	CHAPTER 11
	§	
GRAND FUSION HOUSEWARES, LLC,	§	
	§	Case No. 24-41694
Debtor.	§	
	§	

**DEBTOR'S MOTION FOR ENTRY OF AN ORDER (A) SCHEDULING A
HEARING ON CONFIRMATION OF THE DEBTOR'S CHAPTER 11 PLAN OF
REORGANIZATION; (B) APPROVING THE DEBTOR'S SOLICITATION PACKAGE;
(C) SETTING RELATED DEADLINES; AND (D) GRANTING RELATED RELIEF**

Grand Fusion Housewares, LLC, as the above-captioned debtor and debtor-in-possession (the “Debtor”) in the above-captioned Chapter 11 case (the “Bankruptcy Case”), by and through its undersigned counsel, respectfully submits this *Debtor's Motion for Entry of an Order (A) Scheduling a Hearing on Confirmation of the Debtor's Chapter 11 Plan of Reorganization; (B) Approving the Debtor's Solicitation Package; (C) Setting Related Deadlines; and (D) Granting Related Relief* (the “Motion”). In support thereof, the Debtor respectfully represents as follows:

**DEBTOR'S MOTION FOR ENTRY OF AN ORDER (A) SCHEDULING A
HEARING ON CONFIRMATION OF THE DEBTOR'S CHAPTER 11 PLAN
OF REORGANIZATION; (B) APPROVING THE DEBTOR'S SOLICITATION PACKAGE;
(C) SETTING RELATED DEADLINES; AND (D) GRANTING RELATED RELIEF**

JURISDICTION AND VENUE

1. This Court has jurisdiction over this case and this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the District Court's Miscellaneous Order No. 33, *Order of Reference of Bankruptcy Cases and Proceedings Nunc Pro Tunc*, dated August 3, 1984. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

2. On May 16, 2024 (the “Petition Date”), the Debtor commenced this bankruptcy case by filing a voluntary petition for relief under Chapter 11, Subchapter V of Title 11 of the United States Code (the “Bankruptcy Code”) in this Court. The Debtor continues to manage and operate its business as a debtor-in-possession pursuant to section 1184 of the Bankruptcy Code. Behrooz Vida was appointed as the Subchapter V Trustee. No other trustee, examiner, or official committees have been appointed in this case.

3. On August 14, 2024, the Debtor filed the *Chapter 11 Plan of Reorganization of Grand Fusion Housewares, LLC* [Docket No. 70] (the “Plan”).

RELIEF REQUESTED

4. Pursuant to Subchapter V of the Bankruptcy Code, Rule 2002 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2002-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Northern District of Texas, and Bankruptcy Code section 105(a), the Debtor respectfully requests the entry of an order, substantially in the form attached hereto as Exhibit A (the “Order”):

a. scheduling a hearing (the “Hearing”) to consider confirmation of the Plan;

- b. establishing deadlines and other requirements in connection with confirmation of the Plan, with at least twenty-eight (28) days' notice to creditors and parties-in-interest, for (i) voting on the Plan; and (ii) objecting to confirmation of the Plan;
- c. approving the Solicitation Package (defined below), including the proposed ballot attached hereto as **Exhibit B** (the “Ballot”); and
- d. granting related relief as requested in this Motion.

A. Request for Relief Regarding Deadlines Pertaining to Voting on Plan, Objections to the Plan, and Timing of the Hearing

- 5. The Debtor requests that the Order granting this Motion provide the following:
 - a. the Hearing shall be scheduled for **December 18, 2024, at 9:30 a.m. (Central Time)**;
 - b. the deadline for the Debtor to serve the Plan, the Ballot, the Order approving this Motion, and the notice of the Hearing, a copy of which is attached hereto as **Exhibit C** (the “Notice of Hearing”), shall be **November 12, 2024**;
 - c. the deadline by which the Debtor must file the Plan Supplement (as defined in the Plan) shall be **December 6, 2024**;
 - d. the deadline for the submission of Ballots to the undersigned so as to be actually received shall be **December 13, 2024, at 5:00 p.m. (Central Time)** (the “Voting Deadline”);
 - e. the deadline by which any objections to the confirmation of the Plan must be filed with the Court and served so as to be actually received shall be **December 13, 2024, at 5:00 p.m. (Central Time)** (the “Objection Deadline”);
 - f. the deadline by which any objection to the Debtor’s proposed assumption or rejection of executory contracts under Section 365 of the Bankruptcy Code, including any proposed cure amounts for the assumption of any executory contract or unexpired lease, so as to be filed with the Court and to be actually received shall be **December 13, 2024, at 5:00 p.m. (Central Time)** (the “Contract Objection Deadline”);
 - g. the deadline by which elections under Section 1111(b) of the Bankruptcy Code shall be made so as to be actually received shall be **December 13, 2024, at 5:00 p.m. (Central Time)** (the “1111(b) Deadline”);

h. A copy of any such objection to the Plan, objection to the assumption or rejection of any executory contract or unexpired leases, or election under Section 1111(b) of the Bankruptcy Code shall be served at the following addresses so as to be actually received on or before such deadline:

Bryan C. Assink
BONDS ELLIS EPPICH SCHAFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
(817) 405-6900 telephone
(817) 405-6902 facsimile
Email: bryan.assink@bondsellis.com

Behrooz Vida
The Vida Law Firm, PLLC
3000 Central Drive
Bedford, TX 76021
Telephone: (817) 358-9977
Email: behrooz@vidalaw.com

Susan B. Hersh
Office of the U.S. Trustee
1100 Commerce Street, Room 976
Dallas, Texas 75242
Telephone: (214) 767-1073
Email: susan.hersh@usdoj.gov

i. the deadline by which a Ballot tabulation must be filed with the Court shall be **December 17, 2024**;

j. the deadline for parties to file witness and exhibit lists with the Court for the Hearing shall be **December 15, 2024; and**

k. the Debtor's deadline to file replies or responses to any objections to confirmation of the Plan, or other pleadings in support of confirmation of the Plan, shall be **December 16, 2024**.

6. The Debtor submits that the timeline and requirements proposed above are fair and reasonable under the circumstances of this case and should be approved.

B. Request for Approval of the Solicitation Package

7. The Debtor requests that the Court approve the Solicitation Package, including the use of the Ballot for submission to the creditors eligible to vote on the Plan. The Debtor will mail the Plan (as may be amended or supplemented), the Ballot, the Order approving this Motion, and the Notice of Hearing (collectively, the “Solicitation Package”) to the Debtor’s creditors.

8. Among other things, the Solicitation Package will set forth (a) the time and place of the Hearing, (b) the classes of creditors under the Plan entitled to vote thereon; (c) the deadline for submission of Ballots; and (d) the deadline for filing and serving objections to the confirmation of the Plan, objections to the assumption and rejection of executory contracts, and the deadline for making elections under Section 1111(b) of the Bankruptcy Code.

9. The Debtor submits that the proposed Solicitation Package satisfies the applicable notice and information requirements set forth in Bankruptcy Rule 2002(b) and should be approved.

WHEREFORE, the Debtor respectfully requests that this Court grant the relief requested in the Motion and award the Debtor such further and other relief that this Court deems just and proper.

Dated: November 6, 2024

Respectfully submitted,

/s/ Bryan C. Assink
Bryan C. Assink
Texas State Bar No. 24089009
BONDS ELLIS EPPICH SCHAFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
(817) 405-6900 telephone
(817) 405-6902 facsimile
Email: bryan.assink@bondsellis.com

**COUNSEL FOR DEBTOR
AND DEBTOR-IN-POSSESSION**

CERTIFICATE OF SERVICE

I certify that on November 6, 2024, a true and correct copy of the foregoing document was served via the Court's CM/ECF system on all parties requesting such service in this case, as well as by United States Mail, first class postage prepaid, upon the limited service list attached hereto.

/s/ Bryan C. Assink
Bryan C. Assink

Exhibit A

“Proposed Order”

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	CHAPTER 11
	§	
GRAND FUSION HOUSEWARES, LLC,	§	
	§	Case No. 24-41694
Debtor.	§	
	§	
	§	

**ORDER GRANTING DEBTOR'S MOTION FOR ENTRY OF AN ORDER (A)
SCHEDULING A HEARING ON CONFIRMATION OF THE
DEBTOR'S CHAPTER 11 PLAN OF REORGANIZATION; (B) APPROVING
THE DEBTOR'S SOLICITATION PACKAGE; (C) SETTING RELATED
DEADLINES; AND (D) GRANTING RELATED RELIEF**

The Court has considered the *Debtor's Motion for Entry of an Order (A) Scheduling a Hearing on Confirmation of the Debtor's Chapter 11 Plan of Reorganization; (B) Approving the Debtor's Solicitation Package; (C) Setting Related Deadlines; and (D) Granting Related Relief* (the “Motion”).¹ After consideration of the Motion and the record in this case, the Court finds that it has jurisdiction over this matter pursuant to 28 U.S.C. § 1334; that the Motion is a core

¹ Capitalized terms used herein but not otherwise defined shall have the meaning given to them in the Motion.

proceeding pursuant to 28 U.S.C. § 157(b)(2); that the Court may enter a final order on the Motion consistent with Article III of the United States Constitution; that the venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; that the Debtor provided adequate and appropriate notice of the Motion under the circumstances and that no other or further notice is required; that the legal and factual bases set forth in the Motion established just cause for the relief granted in this Order; and that any objections filed in response to the Motion have been withdrawn or overruled on the merits.

Accordingly, it is hereby **ORDERED** that:

1. The Motion is **GRANTED** as set forth herein.
2. The Solicitation Package is hereby **APPROVED**.
3. The Ballot, attached as **Exhibit B** to the Motion, completed in conformity with this Order and the Debtor's proposed Solicitation Package, is approved in all respects. The Debtor shall serve the Plan, the Ballot, this Order, and the Notice of Hearing attached as Exhibit C to the Motion on or before **November 12, 2024**.
4. The Debtor's deadline to file the Plan Supplement is **December 6, 2024**;
5. To be counted as a vote to accept or reject the Plan, a Ballot must be properly executed, completed, and delivered to the following address so as to be actually received by no later than **December 13, 2024, at 5:00 p.m. (Central Time)** (the "**Voting Deadline**");

Bryan C. Assink
BONDS ELLIS EPPICH SCHAFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
Email: bryan.assink@bondsellis.com

Ballots received after the Voting Deadline will not be counted except upon further order of the Court.

6. Objections, if any, to confirmation of the Plan shall be filed with the Court and served no later than **December 13, 2024, at 5:00 p.m. (Central Time)**.

7. The deadline for any counter party to any executory contract or unexpired lease to file and serve objections to the assumption or rejection of such executory contract or unexpired lease under section 365 of the Bankruptcy Code, including any proposed cure amounts, is **December 13, 2024, at 5:00 p.m. (Central Time)**.

8. Any party desiring to make an election under Section 1111(b) of the Bankruptcy Code shall do so by service upon Debtor's counsel by **December 13, 2024, at 5:00 p.m. (Central Time)**.

9. A copy of any such objection to the Plan, objection to the assumption or rejection of any executory contract, including proposed cure amounts, or election under Section 1111(b) of the Bankruptcy Code shall be served at the following addresses so as to be actually received on or before such deadline:

Bryan C. Assink
BONDS ELLIS EPPICH SCHAFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
(817) 405-6900 telephone
(817) 405-6902 facsimile
Email: bryan.assink@bondsellis.com

Behrooz Vida
The Vida Law Firm, PLLC
3000 Central Drive
Bedford, TX 76021
Telephone: (817) 358-9977
Email: behrooz@vidalaw.com

Susan B. Hersh
Office of the U.S. Trustee
1100 Commerce Street, Room 976
Dallas, Texas 75242
Telephone: (214) 767-1073
Email: Susan.hersh@usdoj.gov

10. The Debtor shall file a tabulation of Ballots with the Court by no later than **December 17, 2024**, with a copy to be concurrently served upon any party that has filed a timely objection to the Plan.

11. Any witness or exhibit list to be filed in connection with the Hearing to consider confirmation of the Plan shall be filed on or before **December 15, 2024**.

12. The Debtor's deadline to file replies or responses to any objections to confirmation of the Plan, or other pleadings in support of confirmation of the Plan, shall be **December 16, 2024**.

13. A hearing to consider confirmation of the Plan will be held before the Honorable Mark X. Mullin, United States Bankruptcy Judge, at the United States Courthouse, 501 West Tenth Street, Room 128, Fort Worth, Texas 76102 on **December 18, 2024, at 9:30 a.m. (Central Time)** (the "Hearing"). The Hearing may be continued from time to time by the Court without further notice other than the announcement of the adjourned date at the Hearing or any continued hearing.

14. This Court hereby retains jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

END OF ORDER

Respectfully submitted by:

Bryan C. Assink
Texas State Bar No. 24089009
Bonds Ellis Eppich Schafer Jones LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
(817) 405-6900 telephone
(817) 405-6902 facsimile
Email: bryan.assink@bondsellis.com

**COUNSEL FOR DEBTOR
AND DEBTOR-IN-POSSESSION**

Exhibit B

“Ballot”

Bryan C. Assink
Texas State Bar No. 24089009
BONDS ELLIS EPPICH SCHAFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
(817) 405-6900 telephone
(817) 405-6902 facsimile
Email: bryan.assink@bondsellis.com

**COUNSEL FOR DEBTOR
AND DEBTOR-IN-POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	CHAPTER 11
	§	
GRAND FUSION HOUSEWARES, LLC,	§	
	§	Case No. 24-41694
Debtor.	§	
	§	

**CLASSES 3 AND 7 BALLOT FOR ACCEPTING OR
REJECTING PROPOSED CHAPTER 11 PLAN
OF REORGANIZATION OF GRAND FUSION HOUSEWARES, LLC**

The above-captioned debtor and debtor-in-possession (the “Debtor”), has sent this Ballot to you because its records indicate that you are an Entity that holds a Claim against the Debtor, and you have a right to vote to accept or reject the Debtor’s *Chapter 11 Plan of Reorganization of Grand Fusion Housewares, LLC* [Docket No. 70] (as amended or modified, the “Plan”).¹

The Plan and certain other materials served contemporaneously with this Ballot describe your rights and are included in the packet you are receiving with this Ballot. If you do not have a copy of the Plan, or if you need to obtain additional solicitation materials, you may contact Bryan C. Assink, Bonds Ellis Eppich Schafer Jones LLP, as counsel to the Debtor (the “Firm”), 420 Throckmorton Street, Suite 1000, Fort Worth, Texas 76102, telephone: (817) 779-4297, email: bryan.assink@bondsellis.com.

This Ballot may not be used for any purpose other than to vote on the Plan. This Ballot does not constitute, and shall not be deemed to be, a Proof of Claim or an assertion or admission of a Claim. If you believe you have received this Ballot in error, please contact the Firm at the address, telephone number, and/or email address set forth above.

You should carefully and thoroughly review the Plan before you vote. You may wish to seek legal advice concerning the Plan and the Plan’s classification and treatment of your

¹ Capitalized terms used but not otherwise defined in this Ballot shall have the meanings given to them in the Plan.

Claim. If you hold Claims in more than one Class, you will receive a separate Ballot for each Class in which you are entitled to vote.

If your Ballot is not actually received by the Firm on or before December 13, 2024, at 5:00 p.m. (Central Time), and if the such deadline is not extended, your vote will not count. If the Court confirms the Plan, it will bind you regardless of whether or not you vote.

[Remainder of Page Intentionally Left Blank]

1. Amount of Claim

The undersigned certifies that as of the date hereof, the undersigned is an Entity that holds a Claim in the Class indicated below in the following aggregate unpaid amount (insert amount in box below):

Class: _____

Amount of Claim: \$ _____

2. Vote on Plan

THE DEBTOR RECOMMENDS THAT YOU VOTE TO ACCEPT THE PLAN

The Entity that holds the Claim set forth in Item 1 votes to (please check one):

ACCEPT THE PLAN

REJECT THE PLAN

Any Ballot that is executed by an Entity that holds a Claim but that indicates both an acceptance and a rejection of the Plan, or does not indicate either an acceptance or rejection of the Plan, will not be counted.

3. Certifications

By signing this Ballot, the undersigned certifies to the Court and Debtor:

1. That either: (a) the Entity is the holder of the Claim(s) set forth herein; or (b) the Entity is an authorized signatory for an Entity that is a holder of such Claim(s) being voted;
2. that the Entity has received a copy of the Plan and acknowledges that the solicitation thereof is being made pursuant to the terms and conditions set forth in the Plan;
3. that the Entity has cast the same vote with respect to all Claim(s) set forth herein;

4. that no other Ballots with respect to the amount of the Claim(s) identified in herein have been cast or, if any other Ballots have been cast with respect to such Claims(s), then any such Ballots earlier received are revoked;
5. that the Entity understands and, by accepting the Plan, agrees with the treatment provided for its Claim(s) under the Plan; and
6. that the Entity acknowledges and understands that it will be subject to the terms and treatment outlined in the Plan—despite voting to reject the Plan—if the Plan is confirmed.

[Signature Page to Follow]

Name of Holder: _____
(Please print or type)

Signature: _____

Name of Signatory: _____
(If other than Holder)²

Title: _____

Address: _____

Date Completed: _____

**PLEASE COMPLETE, SIGN, AND DATE THE BALLOT AND
RETURN IT PROMPTLY TO:**

Via Electronic Mail or Regular First Class Mail:

bryan.assink@bondsellis.com

or

Bryan C. Assink
Bonds Ellis Eppich Schafer Jones LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102

**YOUR BALLOT MUST ACTUALLY BE RECEIVED BY THE VOTING DEADLINE,
WHICH IS DECEMBER 13, 2024, AT 5:00 P.M. (CENTRAL TIME).**

² If you are completing this Ballot on behalf of another person or Entity, indicate your relationship with such person or Entity and the capacity that you are signing. You may be required to provide additional information or documentation with respect to such relationship.

Exhibit C

“Notice of Hearing”

Bryan C. Assink
Texas State Bar No. 24089009
BONDS ELLIS EPPICH SCHAFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
(817) 405-6900 telephone
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**COUNSEL FOR DEBTOR
AND DEBTOR-IN-POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	CHAPTER 11
	§	
GRAND FUSION HOUSEWARES, LLC,	§	
	§	Case No. 24-41694
Debtor.	§	
	§	

**NOTICE (I) FIXING TIME FOR SUBMITTING BALLOTS VOTING TO
ACCEPT OR REJECT THE CHAPTER 11 PLAN OF REORGANIZATION OF
GRAND FUSION HOUSEWARES, LLC; (II) FIXING TIME FOR PARTIES TO FILE
OBJECTIONS TO CONFIRMATION OF THE PLAN; AND (III) SCHEDULING THE
CONFIRMATION HEARING AND DATES RELATED THERETO**

PLEASE TAKE NOTICE that on August 14, 2024, Grand Fusion Housewares, LLC, as the above-captioned debtor and debtor-in-possession (the “Debtor”), filed its *Chapter 11 Plan of Reorganization of Grand Fusion Housewares, LLC* [Docket No. 70] (the “Plan”) ¹ in the United States Bankruptcy Court for the Northern District of Texas (the “Court”).

PLEASE TAKE FURTHER NOTICE that on or before November 12, 2024, a solicitation package consisting of a copy of this Notice, the Plan (as may be amended or supplemented), the Order approving the Debtor’s solicitation motion at Docket No. [REDACTED] (the “Solicitation Order”), and a Ballot, substantially in the form approved by the Solicitation Order, shall be mailed to all creditors, equity security holders, and any other party required to be served in accordance with the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and shall be transmitted to the United States Trustee as provided in Bankruptcy Rule 3017(d); however, in accordance with 11 U.S.C. § 1126(f), acceptances and rejections of the Plan will not be solicited from any class that is not impaired under the Plan.

¹ Capitalized terms used herein but not defined shall have the meaning set forth in the Plan.

PLEASE TAKE FURTHER NOTICE that the deadline for a party to deliver a Ballot accepting or rejecting the Plan is December 13, 2024, at 5:00 p.m. (Central Time). All Ballots must be timely received by Debtor's counsel at the following address:

Bryan C. Assink
BONDS ELLIS EPPICH SCHAFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
Email: bryan.assink@bondsellis.com

Without further Court order, no acceptances or rejections of the Plan received after the stated deadline shall be counted or otherwise included in the tabulation of Ballots accepting or rejecting the Plan except as may otherwise be authorized by the Court.

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Rule 3020(b)(1), the deadline for filing and serving written objections to confirmation of the Plan is December 13, 2024, at 5:00 p.m. (Central Time).

PLEASE TAKE FURTHER NOTICE that the deadline for any counter party to any executory contract or unexpired lease to file objections to the assumption or rejection of such executory contract or unexpired lease under section 365 of the Bankruptcy Code, including any proposed cure amounts, is December 13, 2024 at 5:00 p.m. (Central Time).

PLEASE TAKE FURTHER NOTICE that any election under Section 1111(b) of the Bankruptcy Code is due in writing to the undersigned by December 13, 2024, at 5:00 p.m. (Central Time).

PLEASE TAKE FURTHER NOTICE that a copy of any objection to confirmation of the Plan, objection to the assumption or rejection of any executory contract, including proposed cure amounts, or election under Section 1111(b) of the Bankruptcy Code, shall be served at the following addresses so as to be actually received on or before such deadline:

Bryan C. Assink
BONDS ELLIS EPPICH SCHAFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
(817) 405-6900 telephone
(817) 405-6902 facsimile
Email: bryan.assink@bondsellis.com

Behrooz Vida
The Vida Law Firm, PLLC
3000 Central Drive
Bedford, TX 76021
Telephone: (817) 358-9977
Email: behrooz@vidalaw.com

Susan B. Hersh
Office of the U.S. Trustee
1100 Commerce Street, Room 976
Dallas, Texas 75242
Telephone: (214) 767-1073
Email: Susan.hersh@usdoj.gov

PLEASE TAKE FURTHER NOTICE that the Debtor shall file a tabulation of Ballots with the Clerk of the Court by no later than December 17, 2024, with a copy to be concurrently served upon any party that has timely filed an objection to confirmation of the Plan.

PLEASE TAKE FURTHER NOTICE that any witness or exhibit list to be filed in connection with the Hearing to consider confirmation of the Plan shall be filed on or before December 15, 2024.

PLEASE TAKE FURTHER NOTICE that a hearing to consider confirmation of the Plan (the “Confirmation Hearing”) will commence on December 18, 2024, at 9:30 a.m. (Central Time), before the Honorable Mark X. Mullin, United States Bankruptcy Judge for the Northern District of Texas, Fort Worth Division, which hearing shall take place at (i) Room 128, U.S. Courthouse, 501 W. Tenth Street, Fort Worth, Texas 76102, and (ii) via WebEx using the following information:

For WebEx Video Participation/Attendance:

Link: <https://us-courts.webex.com/meet/mullin>

For WebEx Telephonic Only Participation/Attendance:

Dial-In: 1.650.479.3207

Meeting ID: 2310-650-8783

PLEASE TAKE FURTHER NOTICE that additional information regarding remote attendance at the hearing can be found at:

<https://www.txnb.uscourts.gov/sites/txnb/files/hearings/WebEx%20Hearing%20Instructions%20for%20Judge%20Mullin%205.14.2024.pdf>.

Dated: November __, 2024

Respectfully submitted,

/s/

Bryan C. Assink
Texas State Bar No. 24089009
BONDS ELLIS EPPICH SCHAFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
(817) 405-6900 telephone
(817) 405-6902 facsimile
Email: bryan.assink@bondsellis.com

**COUNSEL FOR DEBTOR
AND DEBTOR-IN-POSSESSION**

CERTIFICATE OF SERVICE

I certify that on November ___, 2024, a true and correct copy of the foregoing document was served via the Court's CM/ECF system on all parties requesting such service in this case, and by United States Mail, first class postage prepaid, upon the master service list attached hereto.

/s/
Bryan C. Assink

Grand Fusion Housewares, LLC
Case No. 24-41694-MXM-11
Limited Service List
As of 11-6-2024

Debtor:

Grand Fusion Housewares, LLC
12 Partridge
Irvine, CA 92604

20 Largest Unsecured Creditors:

Alliance Funding Group
17542 17th Street #200
Tustin, CA 92780

Cixi Yufei Import & Export Co
Room 1903
Friendship Bldg No.558 Renhe Rd
Cixi City 315300, Zhejiang Prov. China

Integrated Logistics 2000 LLC
PO Box 8372
Virginia Beach, VA 23450

Parker & Bailey Corp
4 Walpole Park
Walpole, MA 02081

Propella Capital LLC
c/o Tucker, Albin & Assoc
1702 Collins Blvd., Ste 100
Richardson, TX 75080

Silverline Services, Inc.
c/o Zachter PLLC
Jeffrey Zachter
2 University Plaza, Ste 205
Hackensack, NJ 07601

American Express National Bank
c/o Becket & Lee LLP
PO Box 3001
Malvern, PA 19355-0701

Flying Cork Media LLC
320 Ft. Duquesne Blvd. Suite 200
Pittsburgh, PA 15222

Peachy Clean
Devine Products LLC
PO Box 1068
Dalton, GA 30722

Rapid Finance
20 West Jefferson, Flr 11
Detroit, MI 48226

Smart Business Funding
20515 NE 22nd Ave
Miami, FL 33180

Capital One
P.O. Box 60599
City Of Industry, CA 91716-0599

Imagination Products Corp.
227 W. Cedar Street
Chillicothe, IL 61523

DFW & Assoc d/b/a Lee & Associates
c/o Conor White
Munsch Hardt Kopf & Harr, PC
500 N. Akard St., Suite 4000
Dallas, TX 75201

Propella Capital LLC
1820 Avenue M, #432
Brooklyn, NY 11230

Silverline Services Inc.
265 Sunrise Highway, Ste 236
Rockville Centre, NY 11570

Smart Business
c/o Triton Recovery LLC
3111 N. University Dr., Ste. 604
Coral Springs, FL 33065

Umbra
1705 Broadway
Buffalo, NY 14212

US Bank
Bankruptcy Dept.
P.O. Box 108
St. Louis, MO 63166-0108

Wells Fargo
333 Market Street, 14th Flr
San Francisco, CA 94105

Wuxi Rayshine Industrial & Trading Co
4-5th Flr, Chiway Center 2166-1
Taihu Avenue Wuxi
Jiangsui 214072 China

Silverline Services Inc.
1334 Peninsula Blvd., Ste. 160
Hewlett, NY 11557

Governmental Agencies:

Office of the United States Trustee
1100 Commerce Street, Room 976
Dallas, TX 75242

Internal Revenue Service
Special Procedures - Insolvency
P.O. Box 7346
Philadelphia, PA 19101-7346

Texas Comptroller
Bankruptcy & Collection Division MC 008
P.O. Box 12548
Austin, TX 78711-2548

California State Comptroller
300 Capitol Mall, Suite 1850
Sacramento, CA 95814

Internal Revenue Service
1100 Commerce St. MC5027DAL
Dallas, TX 75242

Employment Development Department
P.O. Box 826880
Sacramento, CA 94280-0001

Franchise Tax Board
Bankruptcy Section MS A340
P.O. Box 2952
Sacramento, CA 95812-2952

Secured Creditors:

Celtic Bank Corporation
268 S. State Street
Salt Lake City, UT 84111

Midwest Regional Bank
363 Festus Centre Drive
Festus, MO 63028

U.S. Small Business Administration
150 Westpark Way, Suite 130
Euless, TX 76040

First Citizens Community Bank
39 King Arthur Drive
Mill Hall, PA 17751

Subchapter V Trustee:

Behrooz P. Vida
The Vida Law Firm, PLLC
3000 Central Drive
Bedford, TX 76021

Notice of Appearance Parties:

Dallas County
c/o John K. Turner
Linebarger Goggan Blair & Sampson LLP
2777 N. Stemmons Frwy, Ste 1000
Dallas, TX 75207

Midwest Regional Bank
c/o James W. Brewer
Kemp Smith LLP
P.O. Drawer 2800
El Paso, TX 79999-2800

Carrollton-Farmers Branch ISD
c/o Linda D. Reece
Perdue, Brandon, Fielder, Collins & Mott
1919 S. Shiloh Rd., Suite 640, LB40
Garland, TX 75042

Small Business Administration
c/o Dawn Whalen Theiss
Assistant United States Attorney
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699